

**SANTAMARINA & ASSOCIATES, P.C.**

ATTORNEYS AT LAW  
260 MADISON AVENUE, 17TH FLOOR  
NEW YORK, NEW YORK 10016

GIL SANTAMARINA, ESQ.

RACHEL L. ALBINDER, ESQ.

KACY MAYRSOHN, ESQ.

SARA AZARM, ESQ.

MICHAEL A. BARNETT, ESQ., OF COUNSEL

TARA BONILLA, OFFICE MANAGER & TRANSFER AGENT

TELEPHONE: 212-965-1678

FACSIMILE: 212-537-0012

EMAIL: [gil@santamarinalaw.com](mailto:gil@santamarinalaw.com)

WEBSITE: [www.santamarinalaw.com](http://www.santamarinalaw.com)

September 30, 2024

Honorable Jennifer L. Rochan  
United States District Judge  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, NY 10007

Re: Chacon v. Cooks, 23-cv-3056-JLR

Dear Judge Rochan:

Our firm represents the plaintiff in the above-referenced case. I write to respectfully request a 30-day adjournment of the initial pretrial conference currently scheduled for October 2, 2024 at 2:00 p.m. as well as an extension of today's deadline to submit a joint letter and proposed Civil Case Management Plan and Scheduling Order. The main reason for the adjournment is that I have a scheduling conflict on the conference date. Also, the requested extension will give the parties additional time to meet and confer with respect to the discovery issues in this case so that we will be fully prepared for the conference. If a 30-day adjournment of the conference and filing deadline is not possible, we respectfully request that the conference be adjourned to the next available date.

This is the parties' first request for an adjournment. Susanne Toes Keane of the City Bar Justice Center, who will be providing legal assistance to the defendant in connection with discovery in this action, has consented to this request. We appreciate the Court's attention to this matter.


The parties' request for an adjournment of the initial pre-trial conference scheduled for October 2, 2024 is GRANTED. The initial pre-trial conference will be rescheduled for October 30, 2024 at 10:30 a.m. The parties shall submit a joint letter on or before October 23, 2024.

Very truly yours,

Gil Santamarina

**SO ORDERED.**

Dated: September 30, 2024  
New York, New York

  
**JENNIFER L. ROCHON**  
United States District Judge